

345-07/MEU
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
SEAPLUS MARITIME CO., LTD.,

07 CV 5903 (SAS)

Plaintiffs,

NOTICE OF MOTION

-against-

TOUTON FAR EAST PTE. LTD.,

Defendant.

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PLEASE TAKE NOTICE that Defendant TOUTON FAR EAST PTE. LTD. (“TOUTON”), by its attorneys Freehill Hogan & Mahar, LLP, upon the Affirmation of Michael E. Unger dated October 23, 2007, the Memorandum of Law submitted herewith, and the pleadings and proceedings heretofore had herein, will move this Court, at a hearing at the Courthouse located at 500 Pearl Street, New York, New York, before the Honorable Shira A. Scheindlin at 10:00 a.m. on November 15, 2007, or as soon thereafter as counsel may be heard, for the following relief:

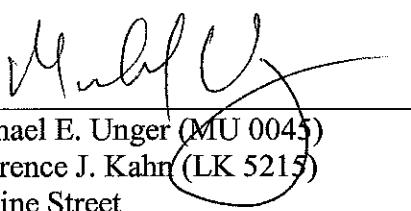
- A) An Order pursuant to Supplemental Admiralty Rules E(2) and E(7) for counter-security for costs and for Defendant's counterclaim; and

B) For such other, further and different relief as may be deemed just and proper in the premises.

Dated: New York, New York
October 24, 2007

FREEHILL HOGAN & MAHAR, LLP
Attorneys for Defendant
TOUTON FAR EAST PTE. LTD.

By:



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